

EXHIBIT 94

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), I, Milton Eduardo Ramirez Cuevas, hereby declare as follows:

1. I am over the age of 18. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.

2. I came to the U.S. when I was under two years old from Guadalajara, Mexico with my mother and father.

3. I grew up in Gresham, Oregon and graduated from Reynolds High School in 2010. Everyone calls me “Eddie.”

4. I applied for the Deferred Action for Childhood Arrivals (“DACA”) program in August 2012. My application was approved in September 2012, and I have remained in the program ever since.

5. I graduated from Portland State University (“PSU”) in 2014. I was charged in-state tuition rates at PSU.

6. After my DACA status was approved in September 2012, I was able to get a paid job in the PSU Admissions Office. I pay taxes in Oregon.

7. In the fall of 2014, I enrolled at the Oregon Health and Sciences University (“OHSU”) in the School of Dentistry. I was charged in-state tuition rates at OHSU.

8. I am currently a fourth year dental student at OHSU. I anticipate graduating from OHSU with a Doctor of Dental Medicine (“DMD”) degree in June of 2018.

9. As an OHSU student, I received a scholarship through the Scholars for a Healthy Oregon Initiative (“SHOI”) for all four years of my education at OHSU.

10. The SHOI program was created by the Oregon legislature to promote better access to healthcare in rural and underserved communities in Oregon. ORS 348.303.

11. The SHOI scholarship provides full tuition and applicable fees for my dental degree program at OHSU. In return, as a recipient I agreed to practice full time as a dentist in a rural or underserved community in Oregon for a minimum of one year longer than the total years of funding received; in my case, that is five years of service. ORS 348.303(3)(c).

12. The eligible locations in Oregon for providing my five years of SHOI service include (i) federally designated Health Professional Shortage Areas, (ii) federally designated Medically Underserved Area or Population, and (iii) Areas of Unmet Need as designated by the Oregon Office of Rural Health. ORS 348.303(1)(a).

13. The terms of the SHOI agreement provide that if I do not begin my service commitment work within 90 days of completing the dental program, and then complete my five years of service, I may have to repay the value of the SHOI scholarship plus an additional twenty-five percent penalty. ORS 348.303(6)-(8).

14. In June 2018, I was offered an externship at the Klamath Falls Open Door Medical Center in Klamath Falls, Oregon, through the School of Dentistry rotation office. This is my second externship rotation in Klamath Falls. This on-the-job externship is required practical experience to meet OHSU's graduation requirements to receive my DMD, and then Oregon license to practice dentistry.

15. The Klamath Falls Open Door Medical Center in Klamath Falls, Oregon provides dental care to in a rural or underserved community in Oregon.

16. My DACA deferred action status expires in September 2018, if it is not renewed.

17. If my DACA status is taken away, I will not be able to work in Oregon as a dentist despite having most likely graduated from OHSU's dental school with my DMD degree and having received an Oregon license to practice dentistry.

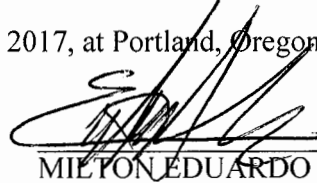
18. If my DACA status is taken away, it will impair my ability to fulfill my SHOI obligations to provide five years of service by working full time as a dentist in a rural or underserved community in Oregon.

19. If my DACA status is taken away, I could be deported to Mexico – a country I have not lived in since infancy. The United States is the only country that I have ever known, and Oregon is the only state that I have ever lived in here. It is my home.

20. My younger brother is a U.S. citizen. I am concerned that if the program ends, my family might be split apart, may not be able to sustain themselves, and may not be able to obtain an education.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14 day of September, 2017, at Portland, Oregon.



MILTON EDUARDO RAMIREZ CUEVAS